

1 **KRYSTYNA STETKIEWICZ**
2 3653 Callahan Avenue
3 Las Vegas, Nevada 89120
4 Telephone (702) 699-7783
5 In Proper Person

ORIGINAL

5 **United States Bankruptcy Court**

6 **District of Nevada**

7 In re:) Case No.: 10-12503-lbr
8 JOHN M. LEFEBVRE and) Chapter: 7
9 NOOJAN SRIKAMPHA,)
10 Debtors,)
11 KRYSTYNA STETKIEWICZ)
12 Plaintiff)
13 v.)
14 JOHN M. LEFEBVRE and)
15 NOOJAN SRIKAMPHA)
16 Defendants)

17 **COMPLAINT**

18 COMES NOW Adversary Creditor, KRYSTYNA STETKIEWICZ, appearing In Proper
19 Person, and her Complaint objecting to the discharge of certain debts claimed in Debtors JOHN M.
20 LEFEBVRE and NOOJAN SRIKAMPHA's Chapter 7 case filed in the above-entitled Court.

21 DATED this ____ day of May, 2010.

22
23 **KRYSTYNA STETKIEWICZ**
24 3653 Callahan Avenue
25 Las Vegas, Nevada 89120
26 Telephone (702) 699-7783
27 In Proper Person
28

MEMORANDUM OF POINTS AND AUTHORITIES

Factual History

3 Creditor STETKIEWICZ is the former wife of Debtor JOHN LEFEBVRE's business partner,
4 Glen Wolf. LEFEBVRE and Wolf are co-owners of The Flooring Center/Flooring America, located
5 at 3170 East Sunset Road, #H, Las Vegas, Nevada 89120. In her Complaint for Divorce filed with
6 the Eighth District Court of the State of Nevada, Case No. D-08-399650-D, she made the allegation
7 that Wolf had opened several credit cards in her name through the internet. (Please see Complaint,
8 Exhibit 1) He and LEFEBVRE then used those credit cards to purchase supplies and merchandise
9 for either use or resale by The Flooring Center. The Court ruled that Wolf and his business associates
10 did perpetrate a fraud upon STETKIEWICZ, obtaining and abusing her credit without her prior
11 knowledge and express consent. It further ruled that Wolf was to pay all of those debts incurred in
12 her name through the illegally obtained credit cards, holding her harmless. (Please see Decree of
13 Divorce, Exhibit 2)

14 STETKIEWICZ'S counsel also filed an action in civil court for fraud, Case No. A571158,
15 naming Wolf, LEFEBVRE and SRIKHAMPHA (aka PHA) as Defendants. (Please see Exhibit 3).
16 The parties entered into a Stipulation and Order concerning the matter with the agreement that the
17 Defendants would pay all of the outstanding debts on the credit cards, agin holding STETKIEWICZ
18 harmless. The matter was dismissed *without prejudice*, pending the complete payment of the debts.

19 When STETKIEWICZ received notification of the above-captioned bankruptcy action, she
20 immediately called the Debtors' counsel in the matter, requesting additional information. In return,
21 she received a copy of Schedule F of the bankruptcy filing. (Please see Exhibit 4) STETKIEWICZ
22 was amazed that the Debtors were attempting to circumvent the terms of the Stipulation and Order
23 from the District Court action in that if they were granted a discharge of those debts, she would be
24 responsible once again to pay those debts that were incurred through the fraudulent actions of the
25 Debtors and her ex-husband.

26 During her research of the bankruptcy proceedings, STETKIEWICZ found out that not only
27 did the Debtors claim her as a creditor, they also claimed her as a Co-debtor on Schedule H of their
28 bankruptcy filing. (Please see Exhibit 5) A co-debtor refers to any person signed onto a debt

1 obligation jointly with a debtor whether as the primary or secondary obligor. STETKIEWICZ was
 2 neither a primary nor secondary obligor with regards to the credit cards. She never signed any
 3 documents to obtain the credit cards or agreed to any of the debts incurred by the use of the cards.
 4 Her name and credit worthiness were used fraudulently by the Debtors and her ex-husband to obtain
 5 merchandise for their business.

6 Further examination of the Debtors' filing revealed that the Debtors' deliberately omitted on
 7 their Statement of Financial Affairs the existence of the District Court civil suit. (Please see Exhibit
 8 6) STETKIEWICZ believes that they did so in an attempt to hide the suit from the bankruptcy court
 9 and the fact that the creditor claim made by them for STETKIEWICZ in the amount of \$62,320.00
 10 was based on the fraud they perpetrated against her.

11 **Legal Argument**

12 STETKIEWICZ brings her claim based on US Bankruptcy Codes §523(a)(2) [false pretenses,
 13 false representation, actual fraud] and §523(a)(4) [fraud as fiduciary, embezzlement, larceny].

15 Not only did the Debtors defraud this Honorable Court by misstating the true status of
 16 STETKIEWICZ and the nature of that debt they incurred against her, they purposefully did not
 17 divulge the existence of the civil suit where fraud was a cause of action and where any judgement
 18 in that matter cannot be discharged in a bankruptcy.

19 Therefore, STETKIEWICZ respectfully requests that the Debtors' claim for discharge of the
 20 debt they have incurred against her be denied.

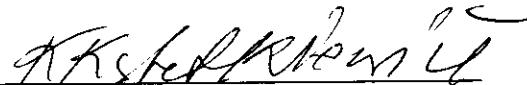
21 WHEREAS, the Creditor, KRYSTYNA STETKIEWICZ, prays:

23 1. That the Court finds that JOHN M. LEFEBVRE and NOOJAN SRIKHAMPHA
 24 purposefully and methodically misrepresented to this Honorable Court the true and
 25 correct status of the Creditor and the nature of the debt they incurred against her;

26 2. That the Court finds that JOHN M. LEFEBVRE and NOOJAN SRIKHAMPHA
 27 purposefully omitted information concerning the district court civil suit in an attempt
 28 to hide its existence from the Court, thus committing a further fraud upon the Court;

- 1 3. That the Court deny the discharge of the Debtors' claim against her;
- 2 4. For further relief as the Court deems proper in the premises.

3 DATED this 24 day of May, 2010.
4

5 
6 **KRYSTYNA STETKIEWICZ**

7 3653 Callahan Avenue
8 Las Vegas, Nevada 89120
9 Telephone (702) 699-7783
In Proper Person

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EXHIBIT 1

ORIGINAL

52
FILED

1 COMP
2 Geoffrey A. Potts, Esq.
3 Nevada Bar No. 4032
4 LAW OFFICES OF GEOFFREY A. POTTS, P.C.
5 1055 Whitney Ranch Dr. #110
6 Henderson, Nevada 89014
7 Telephone: (702) 498-7946
8 Attorney for Plaintiff

SEP 10 4 57 PM '08

Chas. S. Potts
CLERK OF THE COURT

9 IN THE EIGHTH JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA
10 IN AND FOR CLARK COUNTY

11 KRYSTYNA STETKIEWICZ,
12 Plaintiff,
13 vs.
14 GLEN WOLF,
15 Defendant..

16 CASE NO. D08-399650-D
17 DEPT. NO. J

COMPLAINT FOR DIVORCE

18 COMES NOW, Plaintiff, KRYSTYNA STETKIEWICZ (hereinafter referred to as
19 "Krystyna" or "Plaintiff") by and through her attorney, Geoffrey A. Potts, Esq., and for her
20 cause of action against the Defendant, GLEN WOLF (hereinafter referred to as "Wolf" or
21 "Defendant"), states and alleges as follows:

22 1. Krystyna, is now, and for more than six weeks preceding the commencement of
23 this action has been, an actual, bona fide resident of the County of Clark, State of Nevada, and
24 during all of said period of time has been actually, physically and corporeally present, residing
25 and domiciled in the State of Nevada.

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CE28

1 2. Krystyna and Glen were married on June 10, 1999, in Miami, Florida, and the
2 parties are still husband and wife even though they have lived separate and apart for over one
3 year.

4 3. There are no children as a result of this marriage, Krystyna is not pregnant and
5 there are no adopted minor children of the marriage.

6 4. Parties hereto entered into a prenuptial agreement on June 9, 1999, a copy of
7 which is attached hereto as Exhibit "A".

8 5. Krystyna brought in to the marriage cash assets and real property in excess of
9 \$35,000.

10 6. Before the marriage Wolf was in serious financial difficulties and brought little
11 to no assets into the marriage.

12 7. There is community property belonging to the parties hereto, to-wit:

13 a. Real property located at 3653 Callahan Avenue, Las Vegas, NV 89120,
14 with no encumbrance;

15 b. A condominium located at 4960 Harrison Drive, Apt. 118, Las Vegas,
16 NV 89120, with no encumbrance;

17 c. Household furniture and furnishings for both properties;

18 d. Checking and savings account;

19 e. 2001 Lexus RX 300 with no encumbrance;

20 f. A second Lexus with no encumbrance;

21 g. We are informed and believe and therefore allege that defendant Wolf
22 had additional financial accounts containing community property; and,

1 h. A 50% interest in The Flooring Center – Flooring America (due to fraud
2 on the part of defendant Wolf and others, Krystyna signed away her rights to this company as
3 part of their separation. This issue is the subject of a related action currently pending in the
4 Eight Judicial District in and for Clark County Nevada as Case No. A571158. We are informed
5 and believe and therefore allege that defendant Wolf and others involved in the company
6 fraudulently and illegally used Krystyna's good credit to obtain credit cards in relation to the
7 business and incurred debt in Krystyna's name believed to be in an amount of over \$100,000).
8

8. The Court should award to Plaintiff the following community property as her
10 sole and separate property:
11

12 a. Real property located at 3653 Callahan Avenue Las Vegas, NV 89120.
13 b. Household furniture and furnishings related to said real property;
14 c. 50% of all checking and savings accounts including, especially, all those
15 financial accounts opened by defendant Wolf;

19 9. The Court should award to Defendant the following community property as his
20 sole and separate property:

22 a. A condominium located at 4960 Harrison Drive, Apt. 118, Las Vegas,
23 NV 89120;

1 10. That the Court should order an appraisal of The Flooring Center - Flooring
2 America; and that Defendant immediately pay to Plaintiff the value of 1/2 of the company; that
3 Defendant be ordered to immediately cease and desist from using Krystyna's name, financial
4 information and any other information related to Krystyna's identity; that defendant Wolf
5 immediately pay completely in full any debt incurred by him or by the company using
6 Krystyna's name, financial information or any other information related to Krystyna's identity;
7 and, that Defendant hold Krystyna harmless from any such debt.
8
9

10 WHEREFORE, Plaintiff respectfully requests the following orders from the Court:

11 1. That the bonds of matrimony now and heretofore existing between Plaintiff and
12 Defendant be dissolved and that Plaintiff be granted an absolute Decree of Divorce and that
13 each of the parties hereto be restored to the status of a single, unmarried person.

14 2. There is community property belonging to the parties hereto, to-wit:

15 a. Real property located at 3653 Callahan Avenue Las Vegas, NV 89120,
16 with no encumbrance;

17 b. Condominium located at 4960 Harrison Drive, Apt. 118, Las Vegas, NV
18 89120, with no encumbrance;

19 c. Household furniture and furnishings for both properties;

20 d. Checking and savings account;

21 e. 2001 Lexus RX 300 with no encumbrance;

22 f. Second Lexus with no encumbrance;

23 g. We are informed and believe and therefore allege that defendant Wolf
24 had additional financial accounts containing community property; and,

25 h. A 50% interest in The Flooring Center – Flooring America.

1 3. The Court should award to Plaintiff the following community property as her
2 sole and separate property:

3 a. Real property located at 3653 Callahan Avenue Las Vegas, NV.
4 b. Household furniture and furnishings related to said real property;
5 c. 50% of all checking and savings accounts including, especially, all those
6 financial accounts opened by defendant Wolf;
7 d. 2001 Lexus RX 300; and
8 e. Plaintiff's personal property and belongings.

9 4. The Court should award to Defendant the following community property as his
10 sole and separate property:

11 a. Condominium located at 4960 Harrison Drive, Apt. 118, Las Vegas, NV
12 89120;
13 b. Household furniture and furnishings related to said real property;
14 c. 50% of all checking and savings accounts;
15 d. Lexus; and,
16 e. Defendant's personal property and belongings.
17 f. That the Court should order an appraisal of The Flooring Center –
18 Flooring America; and that Defendant immediately pay to Plaintiff the value of 1/2 of the
19 company; that Defendant be ordered to immediately cease and desist from using Krystyna's
20 name, financial information and any other information related to Krystyna's identity; that
21 defendant Wolf immediately pay completely and in full any debt incurred by him or by the
22 company using Krystyna's name, financial information or any other information related to
23 Krystyna's identity; and, that Defendant hold Krystyna harmless from any such debt.
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1 5. That the Court should order Defendant to be responsible for, and hold the
2 Plaintiff harmless from, any other community debts and obligations.

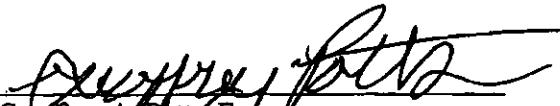
3 6. That due to the fraudulent activities engaged in by Defendant Wolf, that he be
4 ordered to pay all of Plaintiff's attorneys fees and costs.

5 7. That given the large differences in income between Plaintiff and Defendant, that
6 this Court should compel Defendant Wolf to make support payments to Plaintiff.

7 8. For such other and further relief as the Court deems just and proper in the
8 premises.

9
10 DATED this 9th day of September, 2008.

11
12 LAW OFFICES GEOFFREY A. POTTS

13
14 
15 Geoffrey A. Potts, Esq.
16 Nevada Bar No. 4032
17 1055 Whitney Ranch Dr. #110
18 Henderson, Nevada 89014
19 Telephone: (702) 498-7946
20 Attorney for Plaintiff

VERIFICATION

STATE OF NEVADA)
COUNTY OF CLARK)
SS:

KRYSTYNA STETKIEWICZ, under penalties of perjury, being first duly sworn,
deposes and says:

7 That I am the Plaintiff in the above-entitled action; that I have read the foregoing
8 Complaint for Divorce and know the contents thereof; that the same is true of my own
9 knowledge, except for those matters therein contained stated upon information and belief, and as
10 to those matter, I believe them to be true.
11

12 DATED this 9 day of September, 2008.

KRYSZTINA STĘTKIEWICZ

15 SUBSCRIBED and SWORN to before me
on this 14 day of September, 2008.

NOTARY PUBLIC in and for Said
County and State.



EXHIBIT “A”

06/09/99

Premupital agreement

This agreement is between

Glen Steven Wolf
Date of birth 9/14/52
Chicago, IL

and

Kryslyna Stetkiewicz
Date of birth 02/18/61
Poland

In the event of the marriage ending in a divorce all personal property, assets, holdings and liabilities of Glen Steven Wolf and Kryslyna Stetkiewicz before the marriage date will not be part of the divorce settlement.

Kryslyna Stetkiewicz
Kryslyna Stetkiewicz
Glen Steven Wolf
Glen Steven Wolf



Althea L. Chung
6/9/99

EXHIBIT 2

ORIGINAL

1 NEOJ
2 CHRISTOPHER R. TILMAN, ESQ.
3 Nevada Bar No. 005150
4 1211 South Maryland Parkway
5 Las Vegas, Nevada 89104
6 (702) 214-4214
7 Attorney for Defendant
8 Glen Wolf

FILED

SEP 3 11:31 AM '09

Elie B. Wolf
Clerk of the Court

7 DISTRICT COURT

8 CLARK COUNTY, NEVADA

10
11
12 KRYSTYNA STETKIEWICZ,) Case No. D-08-399650-D
13 Plaintiff,) Dept No. J
14 vs.)
15 GLEN WOLF,) Date of Hearing: N/A
16 Defendant.) Time of Hearing: N/A

17 **NOTICE OF ENTRY OF DECREE OF DIVORCE**

18 PLEASE TAKE NOTICE that on the 31st day of August, 2009, the Honorable Kenneth E.
19 Pollock entered a Decree of Divorce, a copy of which is attached hereto.

20 DATED this 21 day of September, 2009.

21
22
23 CHRISTOPHER R. TILMAN, ESQ.
24 Nevada Bar No. 005150
25 1211 South Maryland Parkway
26 Las Vegas, Nevada 89104
27 Attorney for Defendant

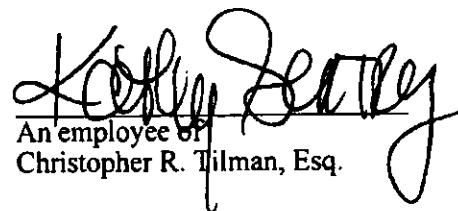
RECEIVED
SEP 4 2009
CLERK OF THE COURT

1
2 **CERTIFICATE OF MAILING**

3 I hereby certify that on that service of this **NOTICE OF ENTRY OF DECREE OF**
4 **DIVORCE** was made this 2nd day of September, 2009, by depositing a copy thereof in a sealed
envelope, first class postage prepaid, in the U.S. Mail, addressed to:

5 Geoffrey Potts, Esq.
6 1055 Whitney Ranch Dr.
Henderson, NV 89014

7 Glen Wolf
8 5150 Shadow Hill Drive
Las Vegas, NV 89120

9
10 
11 An employee of
Christopher R. Tilman, Esq.

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COPY

1 DECD
2 CHRISTOPHER R. TILMAN, ESQ.
3 Nevada Bar No. 05150
4 1211 South Maryland Parkway
5 Las Vegas, Nevada 89104
6 (702) 214-4214
7 Attorney for Defendant
8 Glen Wolf

AUG 31 9 47 AM '09

Christopher R. Tilman
CLEVELAND, OHIO

9

10

11

DISTRICT COURT

12

CLARK COUNTY, NEVADA

13

14 KRYSTYNA STETKIEWICZ, }
15 Plaintiff, } Case No. D-08-399650-D
16 vs. } Dept No. J
17 GLEN WOLF, }
18 Defendant. } Date of Hearing: N/A
19 Time of Hearing: N/A

DECREE OF DIVORCE

20 This matter, having been submitted to the Court via a Summary Disposition, Plaintiff,
21 appearing through her attorney, Geoffrey A. Potts, Esq., and Defendant, appearing through his
22 attorney Christopher R. Tilman, Esq., and the Court, having and examined all of the pleadings, and
23 the cause having been submitted for decision and comment, and the Court being fully advised as
24 to the law in the facts of this case, finds:

25 That the Court has jurisdiction in the premises, both as to the subject matter thereof as well
26 as the parties herein;

27 That the Defendant now is, and has been, an actual and bona fide resident of the County of
28 Clark, State of Nevada and has been actually domiciled therein for more than six (6) weeks

TKR

1 immediately preceding the commencement of this action;

2 That both parties are entitled to a Decree of Divorce on the grounds as set forth in their
3 Complaint and Answer;

4 That the Defendant has filed an Answer and has therefore waived findings of fact, and
5 conclusions of law and written notice of entry of judgment in said cause; and,

6 That there are no minor children the issue of this marriage; there are no adopted children the
7 issue of this marriage; and the Plaintiff is not pregnant.

8 **IT IS HEREBY ORDERED, ADJUDGED AND DECREED** that the bonds of matrimony
9 heretofore now existing between the Plaintiff and Defendant be, and the same are, hereby wholly
10 dissolved and an absolute Decree of Divorce is hereby granted to the Plaintiff, and each of the
11 parties hereto is hereby restored to the status of a single, unmarried person.

12 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the parties acknowledge
13 that they have had a full and fair opportunity to conduct discovery of assets and debts. The parties
14 further acknowledge that it is desire to proceed with this stipulated Decree of Divorce based upon
15 their desire to resolve the divorce based upon each other's respective assets and debts. The parties
16 further confirm that the division of assets and debts are fair and equitable.

17 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that if any claim, action or
18 proceeding is brought seeking to hold one of the parties hereto liable on account of any debt,
19 obligation, liability, act or omission assumed by the other party, the responsible party shall, at his
20 or her sole expense, defend the innocent party against any such claim or demand and he or she will
21 indemnify, defend and hold harmless the innocent party.

22 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that neither party should be
23 required to pay spousal support or alimony to the other party.

24 **IT IS FURTHER ORDERED, ADJUDGED AND DECREED** that the Plaintiff shall receive
25 as her sole and separate property the following:

26 1. 100% of the home and equity contained therein located at 3653 Callahan Avenue, Las
27 Vegas, Nevada, and Defendant herein specifically waives any and all interest contained therein.



1 2. 2000 Lexus RX300 automobile, free and clear of encumbrance thereon.
2 3. One-half(50%) of the AXA Annuity, currently held in both parties names, approximate
3 value \$37,682.00.

4 4. 100% of the AXA Annuity in her name, and Defendant herein specifically waives any and
5 all interest contained therein.

6 5. Any and all bank accounts in her name.
7 6. All personal effects and property in her possession.
8 7. All furniture and furnishings in her possession.

9 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the Defendant shall
10 receive as his sole and separate property the following:

11 1. 100% of his business as well as 100% of any stock in "The Flooring Center/ Flooring
12 America, Inc. The Plaintiff had previously waived any and all interest contained therein.

13 2. One-half(50%) of the AXA Annuity, currently held in both parties names, approximate
14 value \$37,682.00.

15 3. 100% of the home and equity contained therein located at 4960 Harrison Drive, Las
16 Vegas, Nevada. Plaintiff herein specifically waives any and all interest contained therein.

17 4. 100% of the home and equity contained therein located at 5150 Shadow Hill Drive, Las
18 Vegas, Nevada. Plaintiff herein specifically waives any and all interest contained therein.

19 5. 2008 Dodge Caravan, subject to encumbrance thereon.
20 6. 2004 Cadillac Escalade, subject to encumbrance thereon.
21 7. Any and all bank accounts in his name..
22 8. All personal effects and property in his possession.
23 9. All furniture and furnishings in his possession.

24 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that as and for property
25 settlement agreement, the community debts of the parties to be divided as follows:

26 The Plaintiff shall be responsible for the payment of, and hold the Defendant harmless from,
27 the following debts:

[Signature]

1 1. Any and all debts incurred in her name.

2 That the Defendant shall be responsible for the payment of, and hold the Plaintiff harmless
3 from, the following debts:

4 1. Any debts associated with his business "The Flooring Center/Flooring America, Inc."

5 2. Loan on the 2008 Dodge Caravan.

6 3. Bank of America, account ending 4626, approximate balance \$20,828.00.

7 4. US Bank, account ending 6280, approximate balance \$5,385.00.

8 5. US Airways Mastercard, account ending 2505, approximate balance \$17,315.00.

9 6. Chase, account ending 0328, approximate balance \$7,743.00.

10 7. Any debts associated with his business The Flooring Center/Flooring America, Inc.

11 8. Mortgage on the 5150 Shadow Hill Drive property.

12 9. Citi Mastercard, account ending 2182, approximate balance \$15,324.00.

13 10. Any and all debts incurred in his name.

14 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that the parties will cooperate
15 with the execution of any and all documents to effectuate this Decree of Divorce. This Court shall
16 retain jurisdiction over this matter.

17 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that should any party
18 reasonably retain counsel for the purpose of enforcing or preventing the breach of any provision of
19 this Decree of Divorce then the prevailing party shall be entitled, in addition to any other relief as
20 may be granted, to be reimbursed by the other party for all costs and expenses incurred thereby,
21 including, but not limited to, reasonable attorney's fees and costs for services rendered to the
22 prevailing party.

23 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Plaintiff's former name

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1 of: KRYSTYNA STETKIEWICZ be restored to her.

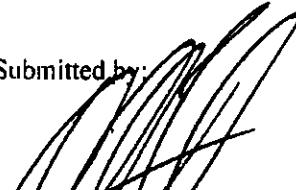
2 IT IS FURTHER ORDERED, ADJUDGED AND DECREED that each party shall bear their
3 own attorney's fees and costs.

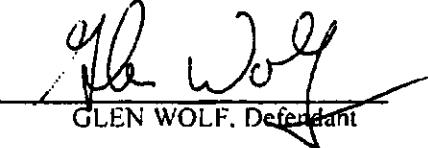
4 Dated this 26th day of August, 2009.

5 KENNETH E. POLLOCK

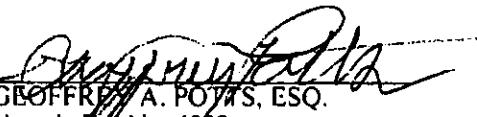
6 DISTRICT JUDGE

7 Submitted by:

8 
9 CHRISTOPHER R. TILMAN, ESQ.
10 Nevada Bar Number 5150
11 1211 South Maryland Parkway
12 Las Vegas, NV 89104
13 Attorney for Defendant


10 GLEN WOLF, Defendant

11 Approved as to form and content:

12 
13 CHRISTOPHER A. POTTS, ESQ.
14 Nevada Bar No. 4032
15 1055 Whitney Ranch Dr. #110
16 Henderson, NV 89014
17 Attorney for Plaintiff


18 KRYSTYNA STETKIEWICZ, Plaintiff



EXHIBIT 3

Logout My Account Search Menu New District Civil Search Refine Search Back

Location : District Court Civil Help

REGISTER OF ACTIONS**CASE NO. 08A571158****Krystyna Stetkiewicz vs Glen Wolf, Noonjan Pha, et al**§
§
§
§
§
§Case Type: Other Civil Filing
Subtype: Conversion of Property
Date Filed: 09/08/2008
Location: Department 16
Conversion Case Number: A571158

PARTY INFORMATION

Lead Attorneys**Conversion** No Convert Value @ 08A571158
Extended Removed: 04/24/2009
Connection Converted From Blackstone
Type**Defendant** Lefebre, John**Norberto Cisneros***Retained*** Confidential Phone
Number ****Defendant** Pha, Noonjan S**Norberto Cisneros***Retained*** Confidential Phone
Number ****Defendant** Wolf, Glen**Norberto Cisneros***Retained*** Confidential Phone
Number ****Plaintiff** Stetkiewicz, Krystyna**Hans R. Baldauf***Retained*** Confidential Phone
Number **

EVENTS & ORDERS OF THE COURT

DISPOSITIONS**10/20/2009 Order of Dismissal Without Prejudice** (Judicial Officer: Williams, Timothy C.)
Debtors: Glen Wolf (Defendant), Noonjan S Pha (Defendant), John Lefebre (Defendant)
Creditors: Krystyna Stetkiewicz (Plaintiff)
Judgment: 10/20/2009, Docketed: 10/22/2009**OTHER EVENTS AND HEARINGS****09/08/2008 Complaint** COMPLAINT FILED Fee \$148.00
08A5711580001.tif pages
09/08/2008 Initial Appearance Fee Disclosure INITIAL APPEARANCE FEE DISCLOSURE
08A5711580002.tif pages
09/17/2008 Amended Complaint FIRST AMENDED COMPLAINT
08A5711580003.tif pages
10/27/2008 Affidavit AFFIDAVIT OF SERVICE - JOHN LEFEBRE
08A5711580006.tif pages
10/27/2008 Affidavit AFFIDAVIT OF SERVICE - GLEN WOLF

11/04/2008	08A5711580007.tif pages Three Day Notice of Intent to Default <i>THREE DAY NOTICE OF INTENT TO ENTER DEFAULT AGAINST DEFTS</i> 08A5711580008.tif pages
11/04/2008	Three Day Notice of Intent to Default <i>THREE DAY NOTICE OF INTENT TO ENTER DEFAULT AGAINST DEFTS</i> 08A5711580009.tif pages
11/04/2008	Three Day Notice of Intent to Default <i>THREE DAY NOTICE OF INTENT TO ENTER DEFAULT AGAINST DEFTS</i> 08A5711580010.tif pages
11/06/2008	Answer <i>ANSWER</i> 08A5711580004.tif pages
11/06/2008	Answer <i>ANSWER</i> 08A5711580005.tif pages
11/06/2008	Initial Appearance Fee Disclosure <i>INITIAL APPEARANCE FEE DISCLOSURE</i> 08A5711580011.tif pages
01/26/2009	Notice <i>NOTICE OF CHANGE OF FIRM NAME AND ADDRESS</i> 08A5711580012.tif pages
10/20/2009	Stipulation and Order
11/05/2009	Notice of Entry of Order <i>Notice of Entry of Order of Dismissal</i>

FINANCIAL INFORMATION

Conversion Extended Connection Type No Convert Value @ 08A571158		
Total Financial Assessment		446.00
Total Payments and Credits		446.00
Balance Due as of 05/23/2010		0.00
09/08/2008	Transaction Assessment	446.00
09/08/2008	Conversion Payment Receipt # 01459616	(148.00)
11/06/2008	Conversion Payment Receipt # 01471884	(194.00)
11/06/2008	Conversion Payment Receipt # 01471885	(104.00)
	KEN R ASHWORTH & ASSOCIATES LAW OFFICES OF CISNEROS & THOMPSON CHTD	
	LAW OFFICES OF CISNEROS & THOMPSON CHTD	

EXHIBIT 4

CLEMENT LAW OFFICES

9960 W. Cheyenne Ave., Suite 190
Las Vegas, Nevada 89129

TELECOPIER:
(702) 341-6558

TELEPHONE:
(702) 341-6997

To: Kristina Steckisizz
From: Stefanie H. Clement, Esq.
Fax #: (702) 699-7783
Re: John Lefebvre
Date: May 14th, 2010
Pages: 7 (Including cover page)

Message:

Ms. Steckisizz,

Enclosed please find the requested information pertaining to John Lefebvre Bankruptcy. Should you have any questions or concerns please do not hesitate to contact our office.

Clement Law Office
Stefanie H. Clement
9960 West Cheyenne Ave., Suite 190
Las Vegas, Nevada 89129

In re JOHN M LEFEBVRE,
NOOJAN SRIKHAMPHA

Case No. 10-12503

Debtors

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS

State the name, mailing address, including zip code, and last four digits of any account number, of all entities holding unsecured claims without priority against the debtor or the property of the debtor, as of the date of filing of the petition. The complete account number of any account the debtor has with the creditor is useful to the trustee and the creditor and may be provided if the debtor chooses to do so. If a minor child is a creditor, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m). Do not include claims listed in Schedules D and E. If all creditors will not fit on this page, use the continuation sheet provided.

If any entity other than a spouse in a joint case may be jointly liable on a claim, place an "X" in the column labeled "Codebtor," include the entity on the appropriate schedule of creditors, and complete Schedule H - Codebtors. If a joint petition is filed, state whether the husband, wife, both of them, or the marital community may be liable on each claim by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community."

If the claim is contingent, place an "X" in the column labeled "Contingent." If the claim is unliquidated, place an "X" in the column labeled "Unliquidated." If the claim is disputed, place an "X" in the column labeled "Disputed." (You may need to place an "X" in more than one of these three columns.)

Report the total of all claims listed on this schedule in the box labeled "Total" on the last sheet of the completed schedule. Report this total also on the Summary of Schedules and, if the debtor is an individual with primarily consumer debts, report this total also on the Statistical Summary of Certain Liabilities and Related Data.

Check this box if debtor has no creditors holding unsecured claims to report on this Schedule F.

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E B O R T O R	Husband, Wife, Joint, or Community	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.			AMOUNT OF CLAIM
			C O N T I N G E N T	U N L I Q U I D A T E D	D I S P U T E D	
Account No. xxxxxxxxxxxxxxxx9063	C		Opened 7/01/04 Last Active 9/06/08 CREDIT CARD PURCHASES			40,389.00
AMERICAN EXPRESS C/O BECKETT AND LEE LLP PO BOX 3001 MALVERN, PA 19356						
Account No. xxxxxxxxxxxxxxxx2303	C		Opened 7/01/04 Last Active 8/22/09 CREDIT CARD PURCHASES			38,910.00
AMEX C/O BECKETT & LEE PO BOX 3001 MALVERN, PA 19356						
Account No. 4610	C		Opened 7/01/04 Last Active 5/14/09 CREDIT CARD PURCHASES			22,973.00
BANK OF AMERICA PO BOX 18026 WILMINGTON, DE 19850						
Account No. 3768	H		Opened 7/01/04 Last Active 6/26/09 CREDIT CARD PURCHASES			16,480.00
BANK OF AMERICA PO BOX 18026 WILMINGTON, DE 19850						
Subtotal (Total of this page)						119,232.00

5 continuation sheets attached

In re

JOHN M LEFEBVRE,
NOOJAN SRIKHAMPHACase No. 10-12503

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS
(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE AND ACCOUNT NUMBER (See instructions above.)	CREDITOR H W J C	Huband, Wife, Joint, or Community	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM, IF CLAIM IS SUBJECT TO SETOFF, SO STATE.			AMOUNT OF CLAIM
			CONTINGENT	UNLIQUIDATED	DISPUTED	
Account No. 3831 BANK OF AMERICA PO BOX 18028 WILMINGTON, DE 19880	C		Opened 8/01/04 Last Active 5/26/09 CREDIT CARD PURCHASES			13,129.00
Account No. 6477 BANK OF AMERICA PO BOX 18028 WILMINGTON, DE 19880	H		Opened 8/01/04 Last Active 5/14/09 CREDIT CARD PURCHASES			11,857.00
Account No. 4041 BANK OF AMERICA PO BOX 881001 Dallas, TX 75288	C		2009 CREDIT CARD PURCHASES			22,513.96
Account No. 7405 BANK OF AMERICA PO BOX 881001 Dallas, TX 75288	C		2009 CREDIT CARD PURCHASES			12,526.70
Account No. 1000008401 BARCLAYS BANK DELAWARE ATTENTION: CUSTOMER SUPPORT DEPARTMENT PO BOX 8833 WILMINGTON, DE 19899	C		Opened 3/01/08 Last Active 5/15/08 CREDIT CARD PURCHASES			31,620.00
Sheet no. <u>1</u> of <u>5</u> sheets attached to Schedule of Creditors Holding Unsecured Nonpriority Claims			Subtotal (Total of this page)			<u>\$1,245.88</u>

B7F (Oversize Form 6F) (12/07) - Cont.

In re

JOHN M LEFEEVRE,
NOOJAN SRIKHAMPHA

Case No. 10-12503

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS
(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E R S T O R Y	H W J C Husband, Wife, Joint, or Community	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	Debtors			AMOUNT OF CLAIM
				C O N T I N G E N T	U N I Q U I D A T E D	D I S P U T E D	
Account No. xxxxxxxxx3380		C	Opened 7/01/04 Last Active 5/20/09 CREDIT CARD PURCHASES				34,472.00
CHASE PO BOX 15298 WILMINGTON, DE 19850							
Account No. xxxxxxxxx3362		H	Opened 7/01/04 Last Active 6/05/09 CREDIT CARD PURCHASES				31,553.00
CHASE PO BOX 15298 WILMINGTON, DE 19850							
Account No. xxxxxxxxx6002		C	Opened 8/01/04 Last Active 5/28/09 CREDIT CARD PURCHASES				20,211.00
CHASE 800 BROOKSEIDGE BLV WESTERVILLE, OH 43081							
Account No. xxxxxxxxx0142		C	Opened 8/01/04 Last Active 6/04/09 CREDIT CARD PURCHASES				16,783.00
CHASE 800 BROOKSEIDGE BLV WESTERVILLE, OH 43081							
Account No. xxxxxxxxx4003		H	Opened 8/01/01 Last Active 5/14/09 CREDIT CARD PURCHASES				12,705.00
CHASE 800 BROOKSEIDGE BLV WESTERVILLE, OH 43081							
Sheet no. 2 of 5 sheets attached to Schedule of Creditors Holding Unsecured Nonpriority Claims				Subtotal (Total of this page)			117,724.00

B7 (Official Form 67) (12/07) - Cont.

In re JOHN M LEFEBVRE,
NOOJAN SRIKHAMPHA

Case No. 10-12603

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS
(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	CODE DEBTOR H W J C	Husband, Wife, Joint, or Community	DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	AMOUNT OF CLAIM			
				CONT INGENT	UNLAW FUL	QUA RTED	DISPUTED
Account No. xxxxxxxxx9221 CITI PO BOX 6241 SIOUX FALLS, SD 57117	C		Opened 9/01/99 Last Active 5/14/09 CREDIT CARD PURCHASES				36,476.00
Account No. xxxxxxxxx6587 CITI PO BOX 6241 SIOUX FALLS, SD 57117	H		Opened 10/01/04 Last Active 5/14/09 CREDIT CARD PURCHASES				31,782.00
Account No. xxxxxxxxx0782 CITI PO BOX 6241 SIOUX FALLS, SD 57117	C		Opened 7/01/04 Last Active 5/26/09 CREDIT CARD PURCHASES				13,181.00
Account No. xxxxxxxxx7061 DISCOVER FIN SVCS LLC PO BOX 15316 WILMINGTON, DE 19850	C		Opened 6/01/99 Last Active 1/06/10 CREDIT CARD PURCHASES				469.00
Account No. xxxxxxxxx1372 GEMBYMOHAWK PO BOX 981439 EL PASO, TX 79968	H		Opened 1/01/08 Last Active 6/17/09 CHARGE ACCOUNT				5,827.00

B7F (Official Form 6F) (12/07) - Cont.

In re JOHN M LEFEBVRE,
NOOJAN SRIGHAMPHA

Case No. 10-12503

Debtors

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS
(Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C R E D I T O R H W J G	Husband, Wife, Joint, or Community DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	CO N T I N G E N T	U N L I O N A P T E D	D I S P U T E D	AMOUNT OF CLAIM
Account No.						
KRYSTYNA STETKIEWICZ 3683 CALLAHAN AVE Las Vegas, NV 89120	C	2008-2009 CREDIT CHARGES			X	62,320.00
Account No. LEFEBVRE						
MAGNUM OPES SUNSET CORP CENTER 4856 JUDSON AVE STE. 110 Las Vegas, NV 89115	C	2008 BUSINESS DEBT				367,482.80
Account No.						
SPRING VALLEY HOSPITAL PO BOX 31001-0827 Pasadena, CA 91110-0827	C	12/09 MEDICAL TREATMENT				Unknown
Account No.						
ST ROSE DOMINICAN HOSPITAL FILE BOX 57124 Los Angeles, CA 90074	C	12/09 MEDICAL TREATMENT				Unknown
Account No. 7436						
US AIRWAYS MASTERCARD PO BOX 13337 Philadelphia, PA 19101	C	2009 CREDIT CARD PURCHASES				30,884.75

Sheet no. 4 of 5 sheets attached to Schedule of
Creditors Holding Unsecured Nonpriority ClaimsSubtotal
(Total of this page) 460,437.85

B6F (Official Form 6F) (12/07) - Cont.

In re JOHN M LEFEBVRE,
NOOJAN SRICHAMPHA

Case No. 10-12503

SCHEDULE F - CREDITORS HOLDING UNSECURED NONPRIORITY CLAIMS
 (Continuation Sheet)

CREDITOR'S NAME, MAILING ADDRESS INCLUDING ZIP CODE, AND ACCOUNT NUMBER (See instructions above.)	C O D E R E S T O R H W J C	Husband, Wife, Joint, or Ownership DATE CLAIM WAS INCURRED AND CONSIDERATION FOR CLAIM. IF CLAIM IS SUBJECT TO SETOFF, SO STATE.	AMOUNT OF CLAIM		
			C O N T I N G E N T	U N L I Q U I D A T E D	D I S C U T T E D
Account No. XXXXXXXXX630	H	Opened 7/01/04 Last Active 5/26/08 CREDIT CARD PURCHASES			23,880.00
US BK RMS CC 101 6TH ST E STE A SAINT PAUL, MN 55101					
Account No. XXXXXXXXX678	C	Opened 7/01/04 Last Active 5/21/09 CREDIT CARD PURCHASES			23,025.00
US BK RMS CC 101 6TH ST E STE A SAINT PAUL, MN 55101					
Account No. XXXXXXXXXXXXXXX1109	H	Opened 9/08/04 Last Active 1/26/10 CREDIT CARD PURCHASES			181.00
WELLS FARGO BANK P.O. BOX 6448 PORTLAND, OR 97208					
Account No. 3264	X C	2008 BUSINESS LOAN			89,920.14
WELLS FARGO BUSINESS DIRECT PO BOX 248780 Sacramento, CA 95824					
Account No.					
Sheet no. 5 of 5 sheets attached to Schedule of Creditors Holding Unsecured Nonpriority Claims			Subtotal (Total of this page)		137,006.14
			Total (Report on Summary of Schedules)		1,013,162.46

EXHIBIT 5

In re **JOHN M LEFEBVRE,
NOOJAN SRIKHAMPHA**

Case No. _____

Debtors

SCHEDULE H - CODEBTORS

Provide the information requested concerning any person or entity, other than a spouse in a joint case, that is also liable on any debts listed by debtor in the schedules of creditors. Include all guarantors and co-signers. If the debtor resides or resided in a community property state, commonwealth, or territory (including Alaska, Arizona, California, Idaho, Louisiana, Nevada, New Mexico, Puerto Rico, Texas, Washington, or Wisconsin) within the eight year period immediately preceding the commencement of the case, identify the name of the debtor's spouse and of any former spouse who resides or resided with the debtor in the community property state, commonwealth, or territory. Include all names used by the nondebtor spouse during the eight years immediately preceding the commencement of this case. If a minor child is a codebtor or a creditor, state the child's initials and the name and address of the child's parent or guardian, such as "A.B., a minor child, by John Doe, guardian." Do not disclose the child's name. See, 11 U.S.C. §112 and Fed. R. Bankr. P. 1007(m).

Check this box if debtor has no codebtors.

NAME AND ADDRESS OF CODEBTOR	NAME AND ADDRESS OF CREDITOR
KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120	BANK OF AMERICA PO BOX 851001 Dallas, TX 75285
KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120	CHASE PO BOX 94014 Palatine, IL 60094
KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120	CITICARDS PO BOX 6000 The Lakes, NV 89163
KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120	US BANK PO BOX 790408 Saint Louis, MO 63179
KRYSTYNA STETKIEWICZ 3653 CALLAHAN AVE Las Vegas, NV 89120	WELLS FARGO BUSINESS DIRECT PO BOX 348750 Sacramento, CA 95834

EXHIBIT 6

2. Income other than from employment or operation of business

None State the amount of income received by the debtor other than from employment, trade, profession, or operation of the debtor's business during the **two years** immediately preceding the commencement of this case. Give particulars. If a joint petition is filed, state income for each spouse separately. (Married debtors filing under chapter 12 or chapter 13 must state income for each spouse whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

AMOUNT	SOURCE
\$17,857.00	2007 SOCIAL SECURITY
\$18,298.00	2008 SOCIAL SECURITY
\$11,390.00	2009 SOCIAL SECURITY
\$3,616.00	YTD

3. Payments to creditors

None *Complete a. or b., as appropriate, and c.*

a. *Individual or joint debtor(s) with primarily consumer debts.* List all payments on loans, instalment purchases of goods or services, and other debts to any creditor made within **90 days** immediately preceding the commencement of this case unless the aggregate value of all property that constitutes or is affected by such transfer is less than \$600. Indicate with an (*) any payments that were made to a creditor on account of a domestic support obligation or as part of an alternative repayment schedule under a plan by an approved nonprofit budgeting and creditor counseling agency. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATES OF PAYMENTS	AMOUNT PAID	AMOUNT STILL OWING
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None b. *Debtor whose debts are not primarily consumer debts:* List each payment or other transfer to any creditor made within **90 days** immediately preceding the commencement of the case unless the aggregate value of all property that constitutes or is affected by such transfer is less than \$5,475. If the debtor is an individual, indicate with an asterisk (*) any payments that were made to a creditor on account of a domestic support obligation or as part of an alternative repayment schedule under a plan by an approved nonprofit budgeting and creditor counseling agency. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR	DATES OF PAYMENTS/TRANSFERS	AMOUNT PAID OR VALUE OF TRANSFERS	AMOUNT STILL OWING
WELLS FARGO HM MORTGAG 8480 STAGECOACH CIR FREDERICK, MD 21701	NOV, DEC, JAN	\$5,241.18	\$217,777.00
DCFS USA LLC 2050 ROANOKE RD WESTLAKE, TX 76262	NOV, DEC, JAN	\$1,938.00	\$6,106.00

None c. *All debtors:* List all payments made within **one year** immediately preceding the commencement of this case to or for the benefit of creditors who are or were insiders. (Married debtors filing under chapter 12 or chapter 13 must include payments by either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

NAME AND ADDRESS OF CREDITOR AND RELATIONSHIP TO DEBTOR	DATE OF PAYMENT	AMOUNT PAID	AMOUNT STILL OWING
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4. Suits and administrative proceedings, executions, garnishments and attachments

None a. List all suits and administrative proceedings to which the debtor is or was a party within **one year** immediately preceding the filing of this bankruptcy case. (Married debtors filing under chapter 12 or chapter 13 must include information concerning either or both spouses whether or not a joint petition is filed, unless the spouses are separated and a joint petition is not filed.)

CAPTION OF SUIT AND CASE NUMBER	NATURE OF PROCEEDING	COURT OR AGENCY AND LOCATION	STATUS OR DISPOSITION
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